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December 13, 2017

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Re: Request of Williston Telephone Company for review of NeuStar Pooling
Administrator Denial of Application for Numbering Resources and to
Issue a Commission Waiver (Docket No. 2017-339-C)

Dear Ms. Boyd:

I am writing to inform the Commission that M. John Bowen, Jr. and I are representing the Applicant, Williston Telephone Company ("Williston"), in the above-referenced matter. Please update the Commission's records to reflect this representation.

We respectfully request that the Commission grant the waiver requested by Williston. As stated in the Petition filed in this docket on November 13, 2017, and as required by 47 C.F.R. § 52.15(g)(5), Williston has demonstrated a verifiable need for the requested numbering resources and has exhausted other remedies. These numbering resources are needed in order to conduct an orderly transition to a new state-of-the-art switching system in Williston, SC, which eventually will replace the legacy switch. The additional numbering resources will allow the new switch to co-exist with the legacy switch until such time as the migration is complete and the legacy switch is decommissioned. At that time, Williston will return the new code and all associated number blocks to the North American Plan Numbering Administrator ("NANPA") and/or NeuStar/the Pooling Administrator, as appropriate.

As shown in the attachments to the Petition filed in this docket, Williston requested the additional numbering resources from NANPA/NeuStar, and the request was denied because Williston does not meet NANPA's utilization threshold. For the reasons stated herein and in the Petition, we ask that the Commission overturn NANPA's decision to deny Williston's request for numbering resources. Granting such a waiver is consistent with the requirements of 47 C.F.R. § 52.15(g)(5). Furthermore, granting the waiver is in the public

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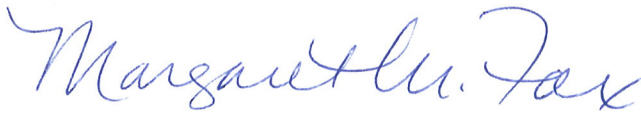
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ATTORNEYS

interest, because it will allow Williston to invest in a state-of-the-art switching system and will provide for a seamless transition of Williston's customers to the new switch. Additionally, because Williston's need for the requested numbering resources is temporary in nature and the number blocks will be returned to the pool, granting the request will not have a long-term impact on the availability of numbering resources in South Carolina.

Please do not hesitate to contact me if you have any questions about this matter.

Sincerely,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:jf

cc: Jeffrey M. Nelson, Office of Regulatory Staff
James C. Meade, TDS